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9

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12

13 UNITED STATES OF AMERICA, )  
14 Plaintiff, )

15 v. )

16 \$152,460.15 IN FUNDS FROM )  
17 WELLS FARGO ACCOUNT )  
NUMBER 031-1834949, )  
18 Defendant. )

19 SAEI COMPANY AND DARIUSH B. )  
20 GILANI, PRESIDENT OF SAEI )  
COMPANY, )  
21 Claimants. )  
22

NO. C 06-5759 JSW

STIPULATION AND ORDER  
STAYING CASE

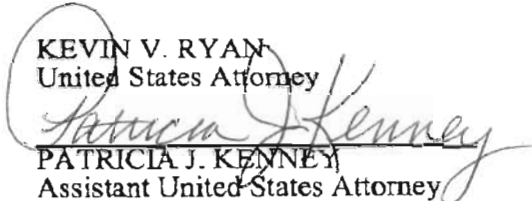
23  
24 The parties agree, subject to the Court's approval, (1) that the instant civil forfeiture case  
25 be stayed, pursuant to 18 U.S.C. § 981(g), pending resolution of a related criminal investigation  
26 in which claimants are targets; (2) that the case management conference scheduled for February  
27 23, 2007, will be taken off calendar until further order of the Court; (3) that, during the period the  
28 case is stayed, the parties shall not be required to respond to discovery requests, including the

interrogatories promulgated by claimant on or about December 14, 2006; (4) that responses to discovery requests shall be due on or before the 30<sup>th</sup> day after the parties hold a Rule 26(f) conference in accordance with Rule 26, Federal Rules of Civil Procedure, which can only occur after the Court has entered an order lifting the stay and setting a case management conference; and (4) that the government shall efile a report approximately every 120 days which informs the Court and counsel for claimants, Robert J. Mulhern, Esq., as to whether the investigation is ongoing.

IT IS SO STIPULATED:

Dated: January 23, 2007

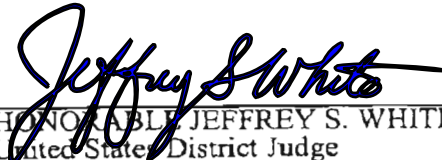
KEVIN V. RYAN  
United States Attorney

  
PATRICIA J. KENNEY  
Assistant United States Attorney  
Attorney for the United States

Dated: January 23, 2007

  
ROBERT J. MULHERN  
Attorney for Claimants SAEI Company and  
Dariush B. Gilani, President, SAEI Company

PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED ON THIS 25th  
OF JANUARY, 2007.

  
HONORABLE JEFFREY S. WHITE  
United States District Judge